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CHEVRON U.S.A. INC.,
9 a Pennsylvania corporation

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12 UNITED STATES DISTRICT COURT

13 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

14 MARK SNOOKAL, an individual,
15 Plaintiff,

16 vs.

17 CHEVRON USA, INC., a California
18 Corporation, and DOES 1 through 10,
19 inclusive,
20 Defendants.

Case No. 2:23-cv-6302-HDV-AJR

**DECLARATION OF SARAH FAN IN
SUPPORT OF JOINT STIPULATION
TO CONTINUE THE NOVEMBER 14,
2024 MOTION HEARING DEADLINE**

District Judge: Hon. Hernán D. Vera
Magistrate Judge: Hon. A. Joel Richlin

Action Filed: August 3, 2023
Trial Date: February 4, 2025

DECLARATION OF SARAH FAN

I, Sarah Fan, declare as follows:

1. I am an attorney licensed to practice law in California. I am an associate with the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel of record for Defendant Chevron USA, Inc. I have personal knowledge of the facts set forth below and, if called as a witness, could and would testify competently to such facts under oath.

2. I made this declaration in support of the Parties' Joint Stipulation to Continue the November 14, 2024 Motion Hearing Deadline.

3. The Parties previously requested a continuance of the Motion Hearing Deadline to allow the Parties to find mutually agreeable dates for Plaintiff to take three fact witness depositions. (*See* Dkt 22-1, Declaration of Olivia Flechsig in Support of Parties' Joint Stipulation to Continue the September 19, 2024 Expert Discovery Cut-Off and the October 29, 2024 Motion Hearing Deadline [hereinafter "Flechsig Decl."], ¶ 5.)

4. The Parties made efforts to schedule the remaining fact witness depositions as soon as possible. Two of these depositions have been set for September 13, 2024, and September 17, 2024. The remaining deposition is of a doctor located in Nigeria, who has not been reachable because he will not be back in the office until September 30, 2024.

5. To date, both Parties have propounded and answered written discovery requests; propounded and answered document discovery requests; and have noticed and taken witness depositions. The Parties have also exchanged expert witness disclosures and reports.

6. The Parties requested one prior continuance in this case on September 3, 2024, seeking a continuance of the Expert Discovery Cut-off and the Motion Hearing Deadline. The Parties respectfully request an adjustment to the Court's Order, to set the Motion Hearing Deadline on December 5, 2024. The Parties intend that the requested continuance will not disturb the current trial or pretrial filing dates.

7. On or about September 5, 2024, I met and conferred with Olivia Flechsig, counsel for Plaintiff Mark Snookal, via phone and email regarding whether Plaintiff will stipulate to continuing the Parties' existing Motion Hearing Deadline. Ms. Flechsig emailed me to confirm Plaintiff's agreement to this effect.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on September 12, 2024, at Culver City, California.

/s/ Sarah Fan

H. SARAH FAN